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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

A.M., an individual,

Plaintiff,

vs.

OMEGLE.COM LLC,

Defendant.

Case No. 3:21-cv-01674-MO

**(SECOND) JOINT MOTION FOR
EXTENSION OF DISCOVERY & PTO
DEADLINES**

BACKGROUND

The parties have been diligently working through discovery but need additional time to complete it. Defendant has produced 37,207 documents in documentary discovery, which the Plaintiff is still reviewing. Both parties have also tendered a second set of written discovery requests, and are in the process of setting up depositions and conferring on potential discovery issues.

JOINT MOTION

Pursuant to Fed. R. Civ. P. 16, LR 16-3, the parties jointly propose the following revised case deadlines (*see* ECF 67) as follows:

Completion of Discovery	October 30, 2023
Filing Dispositive Motions	November 29, 2023
Joint ADR Report:	30 days following Order on dispositive motions
Expert Disclosures/Discovery	TBD when a trial date is set
Joint Proposed Pretrial Order	TBD when a trial date is set
Trial	TBD

CONCLUSION

For the foregoing reasons, the Court should modify the existing case deadlines (ECF No 67) as set forth above.

Dated this 28th day of June, 2023.

LONG LAW PC

s/ Barbara C. Long

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